

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

SABRINA FLOWERS, )  
)  
Plaintiff, )  
)  
vs. ) Court No.: 08 C 449  
)  
SOUTH WESTERN MOTOR SALES, INC., )  
d/b/a TOYOTA SCION ON WESTERN AND )  
SANTANDER CONSUMER USA, INC. )  
d/b/a DRIVE FINANCIAL SERVICES )  
)  
Defendants. )

**NOTICE OF MOTION**

TO: Mr. Keith J. Keogh, Ltd.  
Law Offices of Keith J. Keogh, Ltd.  
227 West Monroe Street, Suite 2000  
Chicago, IL 60606

On **Tuesday, March 11, 2008, at 10:30 a.m.**, or as soon thereafter as counsel may be heard, we shall appear before the **Honorable Judge George M. Marovich**, or any judge sitting in his stead, in Courtroom **1944-C** of the United States District Court, Northern District of Illinois, located at 219 South Dearborn Street, Chicago, Illinois, and then and there present, on behalf of Defendant, SOUTH WESTERN MOTOR SALES, INC. d/b/a TOYOTA ON WESTERN and d/b/a SCION ON WESTERN, improperly sued as SOUTH WESTERN MOTOR SALES, INC. d/b/a TOYOTA SCION ON WESTERN's *Motion to Dismiss Count I of Plaintiff's Complaint, Motion to Dismiss Count II of Plaintiff's Complaint, Motion to Dismiss Count III of Plaintiff's Complaint, and Motion to Dismiss Count IV of Plaintiff's Complaint*, a copy of which is attached hereto and hereby served upon you.


Respectfully Submitted,

\_\_\_\_\_/s/ Brian P. Shaughnessy\_\_\_\_\_  
One of the Attorneys for  
South Western Motor Sales, Inc.

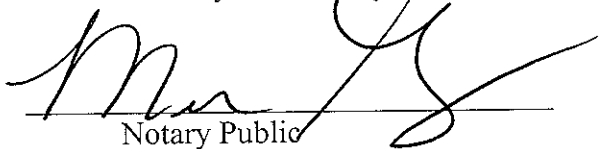
Brian P. Shaughnessy  
Jaya F. Venkataramani  
CREMER, KOPON, SHAUGHNESSY & SPINA, LLC  
Attorney for Defendant, South Western Motor Sales, Inc.  
180 North LaSalle Street, Suite 3300  
Chicago, Illinois 60601  
312/726-3800  
312/726-3818 (fax)  
ARDC No.: 03125181  
186519

**CERTIFICATE OF SERVICE**

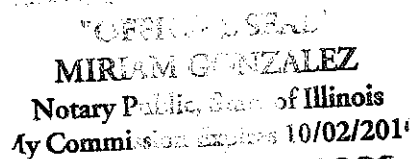
The undersigned, being first duly sworn on oath, deposes and says that she served the foregoing Notice of Motion and the document(s) referenced therein by mailing copies, via U.S. Mail, postage pre-paid, to each person identified above on the 28<sup>th</sup> day of February 2008, at Chicago, Illinois.

  
\_\_\_\_\_  
Laura Rodela

SUBSCRIBED and SWORN TO before  
me this 28<sup>th</sup> day of February, 2008.

  
\_\_\_\_\_  
Notary Public

186519

  
"OFFICIAL SEAL"  
**MIRIAM GONZALEZ**  
Notary Public, State of Illinois  
My Commission Expires 10/02/2011